

**TOMPKINS, McGUIRE, WACHENFELD & BARRY, LLP**

*Counselors at Law*

3 BECKER FARM ROAD, SUITE 402  
ROSELAND, NEW JERSEY 07068-1726  
Roseland (973) 622-3000  
New York (212) 714-1720

**James J. O'Hara**  
Partner

FAX (973)623-7780  
[www.tompkinsmcguire.com](http://www.tompkinsmcguire.com)

Direct Line (973) 623-7041  
[johara@tompkinsmcguire.com](mailto:johara@tompkinsmcguire.com)

October 16, 2022

**Via ECF**

The Honorable Michael A. Hammer,  
United States Magistrate Judge  
Martin Luther King, Jr. Federal Building  
And Courthouse, 2<sup>nd</sup> Floor  
50 Walnut Street  
Newark, New Jersey 07102

**Re: *Bianchi v. Samsung Electronics America, Inc. et al.***  
**Civil Action No.: 2:17-cv-01263-CCC-MAM**

Dear Judge Hammer:

This firm, along with Squire Patton Boggs (US) LLP, represents defendant, Samsung Electronics America, Inc. ("SEA"), in the above-referenced matter. As per Your Honor's direction in the Order of July 18, 2022, we are providing a joint status report.

The parties continue their considerable progress and are in the final stage implementing a novel and complex Settlement Agreement reached with the assistance of the Honorable Dennis M. Cavanaugh, U.S.D.J. (Ret.). As indicated in our last report, we anticipate the process will finish-up in another few months and close to the end of the year.

Respectfully,

/s/ James J. O'Hara  
JAMES J. OHARA  
*On behalf of Defendant,*  
*Samsung Electronics America, Inc.*

Respectfully,

/s/ Kevin Laukaitis  
KEVIN LAUKAITIS  
*On behalf of Plaintiffs*

Cc: Honorable Dennis M. Cavanaugh, U.S.D.J. (Ret.)